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5 Attorney for Solina Walton

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA
7 FOR THE COUNTY OF MARIN

8 CHURCH OF SCIENTOLOGY)
9 INTERNATIONAL, a California)
10 not-for-profit religious)
11 corporation,)
12)
13 Plaintiff,)
14)
15 vs.)
16)
17)
18 GERALD ARMSTRONG; MICHAEL)
19 WALTON; THE GERALD ARMSTRONG)
20 CORPORATION, a California for)
21 profit corporation; DOES 1)
22 through 100, inclusive,)
23)
24 Defendants.)
25 _____)

CASE NO. 157 680

RECEIVED

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HUB LAW OFFICES

VERIFIED ANSWER OF
SOLINA WALTON

26 Defendant SOLINA WALTON responds to the Complaint as follows:

27 1. Defendant does not have sufficient information or belief
28 to respond to paragraph 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14,
29 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 27, 28, 29, 30, 31, 32,
30 34, 37, and basing her denial on that ground, denies each and every
31 allegation of said paragraphs.

32 2. Defendant denies generally and specifically each and every
33 allegation of paragraph 44. With respect to Paragraph 44, defendant
34 specifically denies that plaintiff has been damaged in any sum
35 whatsoever.

36 3. Defendant does not have sufficient information or belief

1 to respond to the general DOE allegations contained in paragraphs
2 35, 36, 38, 39, 41, 42, 43, and 45 and basing her denial on that
3 ground, denies each and every allegation of said paragraphs and
4 with respect to those allegations directed to this defendant, this
5 defendant denies specifically each and every one.

6 4. Defendant admits the allegations in Paragraphs 5 and 6.

7 5. In response to paragraph 26, 33, & 40, Defendant re-
8 alleges and reincorporates herein by reference her responses to
9 paragraphs 1 through 45 of the Complaint.

10 FIRST AFFIRMATIVE DEFENSE

11 6. The Complaint and each and every purported cause of action
12 contained therein fails to state facts sufficient to constitute a
13 cause of action against this answering defendant.

14 7. The Complaint and the whole thereof fails to state facts
15 sufficient to entitle plaintiff to recover punitive damages or any
16 damages whatsoever.

17 SECOND AFFIRMATIVE DEFENSE

18 8. If any allegation contained in the Complaint is adjudged to
19 be true and the plaintiff was injured and/or damaged in any manner,
20 this answering defendant alleges that said injuries and/or damages,
21 if any, were and are the proximate and direct result of the
22 recklessness, carelessness, negligence and fault of the plaintiff
23 and persons other than this answering defendant. In the event that
24 this answering defendant is found to be liable to the plaintiff
25 herein in some manner, this answering defendant requests that his
26 liability be reduced because of the negligence of such other

1 persons, whose conduct contributed to whatever injuries and/or
2 damages plaintiff sustained and requests that any judgment rendered
3 herein in favor of plaintiff and against this answering defendant
4 be in an amount proportionate to this answering plaintiffs
5 individual degree of fault.

6 THIRD AFFIRMATIVE DEFENSE

7 9. Plaintiff is equitably estopped from asserting each and
8 all of the purported causes of action in the complaint by reason of
9 its own acts, omissions and conduct, or that of its agents.

10 FOURTH AFFIRMATIVE DEFENSE

11 10. Plaintiff is barred from bringing this action against
12 this defendant by reason of its own acts, omissions and conduct, or
13 that of its agents.

14 FIFTH AFFIRMATIVE DEFENSE

15 11. Defendant, Solina Walton, is a bone fide purchaser, for
16 value, of the real property which is the subject of this lawsuit.

17 SIXTH AFFIRMATIVE DEFENSE

18 12. Plaintiff is barred from bringing this action against this
19 defendant because of the doctrine of latches.

20
21 WHEREFORE, this answering defendant prays for judgment as
22 follows;

- 23 (1) That plaintiff take nothing by way of its complaint;
24 (2) for costs of suit incurred herein;
25 (3) for attorneys fees;
26 (4) and for such other and further relief as the court may

1 deem just and proper.

2 DATED: January 3, 1995

3
4 MICHAEL WALTON
5 Attorney for Solina Walton

6 **VERIFICATION**

7 I, Solina Walton, declare as follows:

8 I am one of the defendants in the above entitled matter. I have
9 read the foregoing Verified Answer to complaint and know the
10 contents thereof, which are true of my own knowledge except as to
11 those matters which are stated on information and belief, and, as
12 to those matters, I believe them to be true.

13 I declare under penalty of perjury pursuant to the laws of the
14 State of California that the foregoing is true and correct.
15 Executed on January 3, 1995 at San Anselmo, California.

16 Solina Walton
17
18

1 PROOF OF SERVICE BY MAIL

2 STATE OF CALIFORNIA, COUNTY OF MARIN

3 I am a resident of the county aforesaid; I am over the
4 age of eighteen years and not a party to the within entitled
5 action; my business address is 700 Larkspur Landing Circle,
6 Larkspur, California 94939.

7 On January 5, 1995, I served the within VERIFIED ANSWER
8 OF SOLINA WALTON on the interested parties by placing true copies
9 thereof enclosed in sealed envelopes with postage thereon fully
10 prepaid, in the United States mail at San Anselmo, California
11 addressed as follows:

12 Laurie J. Bartilson
13 Bowles & Moxon
14 6255 Sunset Blvd., Suite 2000
15 Los Angeles, CA 90028

16 Wilson, Ryan & Campilongo
17 115 Sansome Street, Suite 400
18 San Francisco, CA 94104

19 Ford Greene, Esq.
20 711 Sir Francis Drake
21 San Anselmo, CA 94960

22 Executed on January 5, 1995 at Larkspur, California.

23 I declare under penalty of perjury that the foregoing is
24 true and correct.
25
26
